

**REMARKS**

Reconsideration of the pending application is respectfully requested on the basis of the following particulars:

**In the claims**

Independent claims 16 and 18 have been amended to point out that sets of biometric reference data each belong to a different system for biometric authentication, and claims 17 and 23 are similarly amended to point out that different algorithms (for converting biometric data into comparative data in claim 17, and for deriving sets of reference data in claim 23) each belong to a different system for biometric authentication. This feature is supported finds support at pages 1 and 3 of the original specification, and therefore no new matter is added.

**Rejection of claims 17, 18, and 21-31 under 35 U.S.C. § 102(b)**

Claims 17, 18, and 21-31 presently stand rejected as being anticipated by Collot et al (U.S. 5,042,073). This rejection is respectfully traversed for at least the following reasons.

According to the present invention, a biometric feature is recorded only once, and is subsequently used to generate several sets of biometric reference data, wherein each set of biometric reference data belongs to a different system for biometric authentication. Accordingly, the present invention uses different algorithms belonging or relating to different systems for biometric authentication in order to generate the different sets of biometric reference data.

The present invention, thus, allows for verifying a biometric feature in a system-independent way, since the present invention provides compatibility with the different systems for biometric authentication. For each different system for biometric authentication, an individual biometric reference data set is generated and stored for the biometric feature.

In contrast, Collot's discloses a system for recognition and verification of signatures as biometric features. According to Collot's system, signatures are characterized by different parameters and, for a given signature to be verified, an optimization is performed in order to select the most relevant of these parameters according to given constraints. However, both the different parameters as well as the selection of relevant parameters are contained within one individual system for biometric authentication. Therefore, Collot is unable to provide the system-independent authentication of the present invention.

Accordingly, Collot fails to disclose or suggest the generation and use of several sets of biometric reference data, each belonging to a different system for biometric authentication. Instead, Collot only discloses generation of a single set of biometric reference data, wherein the single set of biometric reference data is optimized with respect to selected parameters. Thus, the teaching of Collot only enables an authentication in one individual system for biometric authentication, specifically in the system disclosed by Collot.

For at least these reasons, it is respectfully submitted that Collot does not anticipate independent claims 17, 18, and 23 because Collot does not disclose or suggest each and every element set forth in these claims. Therefore, it is respectfully submitted that independent claims 17, 18, and 23, as well as claim 31 which depends from claim 17, claims 19-22 which depend from claim 18 and claims 24-30 which depend from claim 23, are allowable over the cited reference. Accordingly, withdrawal of the rejection is respectfully submitted.

Rejection of claims 16, 19, 20, 32, and 33 under 35 U.S.C. § 103(a)

Claims 16, 19, 20, 32, and 33 presently stand rejected as being unpatentable over Collot in view of Dunn et al (U.S. 5,987,155). This rejection is respectfully traversed for at least the following reasons.

It is respectfully submitted that neither Collot nor Dunn disclose or suggest multiple sets of biometric reference data, each set belonging to a different system for

biometric authentication. Therefore, it is respectfully submitted that claims 16, 19, 20, 32, and 33 are allowable over the cited references. Accordingly, withdrawal of the rejection is respectfully requested.

Conclusion

In view of the amendments to the claims, and in further view of the foregoing remarks, it is respectfully submitted that the application is in condition for allowance. Accordingly, it is requested that claims 16-33 be allowed and the application be passed to issue.

If any issues remain that may be resolved by a telephone or facsimile communication with the Applicant's attorney, the Examiner is invited to contact the undersigned at the numbers shown.

BACON & THOMAS, PLLC  
625 Slaters Lane, Fourth Floor  
Alexandria, Virginia 22314-1176  
Phone: (703) 683-0500

Date: September 5, 2006

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Justin J. Cassell", written in a cursive style.

JUSTIN J. CASSELL  
Attorney for Applicant  
Registration No. 46,205